



Contains No CBI

TOXICOLOGY DEPARTMENT

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21 OCT 92 AM 9:30

LIST ONLY

October 29, 1992

(A)

VIA FEDERAL EXPRESS

Document Processing Center (TS-790)
Office of Toxic Substances
US Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

8EHQ-92-12483
INIT
88920010668

Attn: Section 8(e) Coordinator (CAP Agreement)

RE: Report Submitted Pursuant to the TSCA Section 8(e) Compliance Audit Program

CAP ID No.: 8ECAP - 0004

Dear Sir/Madam:

On behalf of Rhône-Poulenc Inc. (RPI, CN 5266, Princeton, NJ 08543-5266) and its subsidiary Rhône-Poulenc Ag Company, the following information is being submitted to the Environmental Protection Agency (EPA) pursuant to the Toxic Substances Control Act (TSCA) Section 8(e) Compliance Audit Program and the Agreement for a TSCA Section 8(e) Compliance Audit Program (CAP Agreement) executed by RPI and EPA.

This letter provides information on MCTR-135-76 or phosphorodichloridic acid, ethyl ester, CAS number 1498-51-7. This information is being listed under the CAP pursuant to Unit II.B.1.c of the CAP Agreement and thus, no copies of the report are enclosed. The report was previously submitted by RPI to EPA on December 27, 1990 under TSCA Section 8(d) and in compliance with 40 CFR 716 as amended 55FR39784-5.

No claims of confidentiality are made for this submission. The title of the report is "Acute Toxicity Studies of MCTR-135-76". The following is a summary of the adverse effects observed in this study.

This study is being listed under Section 8(e) because of the severe skin and eye irritation and clinical signs observed. In the acute oral toxicity study, clinical signs included decreased locomotor activity, respiratory depression, piloerection, ptosis, and loss of righting reflex. The report did not indicate if these signs were observed in moribund or nonmoribund animals. The oral LD50 was calculated to be 220 mg/kg. In the dermal toxicity study, eschar was observed at the application site throughout the post-dose observation period. Decreased locomotor activity was also observed in the surviving animals throughout the duration of this study. The dermal LD50 was 2350 mg/kg. In the acute inhalation study, 7 out of 10 animals died at a concentration of 2.3 mg/L. This result suggests that the inhalation LC50 might be less than 2.3 mg/L. Decreased locomotor activity, salivation, lacrimation, and severe respiratory difficulties were observed in this study. In the irritation studies, the test material was found to be a severe, irreversible skin and eye irritant.

mm
7/7/95

No previous TSCA Section 8(e) notices have been submitted on this chemical, but two other submissions are being made under the CAP. In total, RPI is submitting three copies of this cover letter: an original and two copies.

Further questions regarding this submission may be directed to the undersigned at 919-549-2222.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn S. Simon". The signature is fluid and cursive, with the first name "Glenn" being more prominent.

Glenn S. Simon, PhD, DABT
Director of Toxicology

Triage of 8(e) Submissions

Date sent to triage: _____

NON-CAP

CAP

Submission number: 12483A

TSCA Inventory:

Y

N

D

Study type (circle appropriate):

Group 1 - Dick Clements (1 copy total)

ECO

AQUATO

Group 2 - Ernie Falke (1 copy total)

ATOX

SBTOX

SEN

w/NEUR

Group 3 - Elizabeth Margosches (1 copy each)

STOX

CTOX

EPI

RTOX

GTOX

STOX/ONCO

CTOX/ONCO

IMMUNO

CYTO

NEUR

Other (FATE, EXPO, MET, etc.): _____

Notes:

THIS IS THE ORIGINAL 8(e) SUBMISSION; PLEASE REFILE AFTER TRIAGE DATABASE ENTRY

For Contractor Use Only

entire document: 0 1 2 pages 1 pages _____

Notes:

Contractor reviewer: JW Date: 1/24/96

✓

CECATS/TRIAGE TRACKING DBASE ENTRY FORM

CECATS DATA:

Submission # 8EHQ-1092-12483 SEQ. A

TYPE: INT SUPP FLWP

SUBMITTER NAME: Rhone-Poulenc Inc.

INFORMATION REQUESTED: FLWP DATE: _____

0501 NO INFO REQUESTED

0502 INFO REQUESTED (TECH)

0503 INFO REQUESTED (VOL ACTIONS)

0504 INFO REQUESTED (REPORTING RATIONALE)

DISPOSITION:

0639 REFER TO CHEMICAL SCREENING

0678 CAP NOTICE

VOLUNTARY ACTIONS:

0401 NO ACTION REPORTED

0402 STUDIES PLANNED/IN PROGRESS

0403 NOTIFICATION OF WORKER CONCERNS

0404 LABEL/MSDS CHANGES

0405 PROCESS/HANDLING CHANGES

0406 APP/USE DISCONTINUED

0407 PRODUCTION DISCONTINUED

0408 CONFIDENTIAL

SUB. DATE: 10/29/92 OTS DATE: 10/30/92 CSRAD DATE: 07/07/95

CHEMICAL NAME:

CAS#

MCTR-135-76

1498-51-7

INFORMATION TYPE:

P F C

0201 ONCO (HUMAN)
0202 ONCO (ANIMAL)
0203 CELL TRANS (IN VITRO)
0204 MUTA (IN VITRO)
0205 MUTA (IN VIVO)
0206 REPRO/TERATO (HUMAN)
0207 REPRO/TERATO (ANIMAL)
0208 NEURO (HUMAN)
0209 NEURO (ANIMAL)
0210 ACUTE TOX. (HUMAN)
0211 CHR. TOX. (HUMAN)
0212 ACUTE TOX. (ANIMAL)
0213 SUB ACUTE TOX (ANIMAL)
0214 SUB CHRONIC TOX (ANIMAL)
0215 CHRONIC TOX (ANIMAL)

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01 02 04
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01 02 04
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01 02 04
01 02 04

INFORMATION TYPE:

0216 EPI/CLIN
0217 HUMAN EXPOS (PROD CONTAM)
0218 HUMAN EXPOS (ACCIDENTAL)
0219 HUMAN EXPOS (MONITORING)
0220 ECO/AQUA TOX
0221 ENV. OCC/REL/FATE
0222 EMER INCI OF ENV CONTAM
0223 RESPONSE REQUEST DELAY
0224 PROD/COMP/CHEM ID
0225 REPORTING RATIONALE
0226 CONFIDENTIAL
0227 ALLERG (HUMAN)
0228 ALLERG (ANIMAL)
0239 METAB/PHARMACO (ANIMAL)
0240 METAB/PHARMACO (HUMAN)

01 02 04

P F C

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INFORMATION TYPE:

0241 IMMUNO (ANIMAL)
0242 IMMUNO (HUMAN)
0243 CHEM/PHYS PROP
0244 CLASTO (IN VITRO)
0245 CLASTO (ANIMAL)
0246 CLASTO (HUMAN)
0247 DNA DAM/REPAIR
0248 PROD/USE/PROC
0251 MSDS
0299 OTHER

P F C

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TRIAGE DATA: NON-CBI INVENTORY

YES

CAS SR

NO

IN TERMINI

ONGOING REVIEW

YES (DROP/REFER)

NO (CONTINUE)

REFER

SPECIES

?

TOXICOLOGICAL CONCERN:

LOW

MED

HIGH

USE:

PRODUCTION:

Summary only
8(d) 59839784-5

12483A

M

Acute oral toxicity is of low concern. Single oral doses (test species not given) yielded an LD₅₀ of 220 mg/kg. Clinical signs included decreased locomotor activity, respiratory depression, piloerection, ptosis, and loss of righting reflex.

L/H

Acute dermal toxicity is of low concern and dermal irritation is of high concern. Single dermal doses (test species not given) yielded an LD₅₀ of 2,350 mg/kg. Decreased locomotor activity was noted in survivors. Eschar was observed at the application site throughout the post-dose observation period.

A 128

medium
Acute inhalation toxicity is of ~~low~~ concern. A single inhalation exposure (duration and test species not given) to 2,300 mg/m³ was lethal to 7/10 animals. Clinical signs included decreased locomotor activity, salivation, lacrimation, and severe respiratory difficulty.

M

Dermal and eye irritation are of moderate concern. The test material was found to be a severe, irreversible skin and eye irritant. No other details were provided.